

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: C.R. BARD, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2187

THIS DOCUMENT RELATES TO THE CIVIL ACTION NO. LISTED ON THE ATTACHED EXHIBIT:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the case listed on the attached Exhibit A and defendant American Medical Systems, Inc. ("AMS") advise the Court that they have compromised and settled all claims between them in this action, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in this action with prejudice, and terminate AMS from the docket in these actions. Other defendants remain in this action, and plaintiffs will continue to prosecute this action against them.

Respectfully:

/s/ Tracy G. Weiss

Tracy G. Weiss
REED SMITH
Three Logan Square, Suite 3100
1717 Arch Street
Philadelphia, PA 19103
215.851.8100 (phone)
215.851.1420 (fax)
tweiss@reedsmith.com
*Attorney for Defendant American Medical
Systems, Inc.*

/s/ Mark Davis

Mark W. Davis
DAVIS & CRUMP
Third Floor
1712 15th Place
Gulfport, MS 39501
228/863-6000
Fax: 228/864-0907
Email: mark.davis@daviscrump.com
Attorney for Plaintiffs on Exhibit A

Dated: April 2, 2015

EXHIBIT A - DAVIS & CRUMP

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-cv-11489	Ruby Kalkbrenner, Ronald Likes v. C. R. Bard, Inc., American Medical Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this member case.

/s/Tracy G. Weiss